

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF ARKANSAS  
CENTRAL DIVISION**

**UNITED STATES OF AMERICA**

**PLAINTIFF**

**v.**

**CASE NO. 4:18-CR-00405-BSM**

**AARON MARCELL YOUNG**

**DEFENDANT**

**ORDER**

Aaron Young's motions to reduce his sentence and appoint counsel [Doc. No. 64] are denied. First, Young's motion to reduce his sentence is denied because the retroactive application of amendment 821 to the federal sentencing guidelines does not reduce his sentencing range. This is true because the amendment merely reduces his criminal history points from nine to eight, and therefore his criminal history category remains at level IV. Second, Young's motion to appoint counsel is denied because there is no right to appointed counsel in sentence modification proceedings. *United States v. Harris*, 568 F.3d 666, 669 (8th Cir. 2009).

IT IS SO ORDERED this 1st day of December, 2023.

  
UNITED STATES DISTRICT JUDGE